Remarks

Applicant would like to thank the Examiner for the courteous interview conducted with Applicant's representative on October 25, 2006. Pursuant to the discussion during the interview, Applicant is submitting the present remarks detailing how the cited references do not meet the claim limitations and requesting, as suggested by the Examiner, an explanation how the cited references meet each limitation of each of the pending claims.

The present reply is in response to the Office action dated June 14, 2006 where the Examiner has rejected claims 1 - 21 and 34 - 39. In the present reply, none of the claims have been amended. Accordingly, claims 1 - 21 and 34 - 39 are pending in the present application with claims 1, 13, and 34 being the independent claims. Reconsideration and allowance of pending claims 1 - 21 and 34 - 39 pursuant to the discussion during the interview and in view of the following remarks are respectfully requested.

35 USC §102(e)

Claims 1-21

Pending claims 1 – 21 stand rejected under section 102(e) as being anticipated by U.S. Patent No. 6,369,840 ("Barnett"). Applicant submits that the pending claims 1-21 are presently in condition for allowance as each and every element of the pending claims are not disclosed by Barnett.

In the Office Action, the Examiner contends that Barnett's calendaring method anticipates Applicant's event-tracking method for tracking events surrounding a user's interaction with network devices. This argument is hereby respectfully traversed and it is submitted that the invention is fully distinguished from Barnett, as explained in more detail below.

The claimed invention is directed toward an event-tracking method that tracks users' web browsing interactions with network devices. In claim 1, the method is clarified in that it is directed toward analyzing the data that is descriptive of the user interaction and retrieving a corresponding set of instructions that are then executed to extract and store the data in a database. The purpose of the web browsing event-tracking method is to monitor and collect information about a user's interactions with the network devices by recording, for example, items that were put into or removed from a web based shopping cart, URL addresses of Web sites visited by a user, links to Web pages

visited by the user, IDs of users who interacted with a particular Web site, files that were downloaded by the user, etc. More sophisticated embodiments of the invention employ event identifications and particular instructions to be carried out by the event-tracking server in association with the presence of a specific event identifier.

In contrast, Barnett discloses a network based calendaring system, which allows a user to login to a personal account, manage a personal calendar and share that calendar with other users. Barnett's calendaring system allows the user to specify categories for a calendar entry, retrieve information related to the specified category from a data server, display information about an upcoming event listed in the specified category and add the information about the upcoming event to the calendar entry. (See col. 3 lines 8 – 61). In addition, the calendaring system allows the user to set up a calendar for a group of users, specify the members of the group, import information from other users' calendars and view a directory of upcoming events broken down by category. (See col. 2 lines 56 – 63). Nevertheless, Barnett's calendaring system does not monitor or track user interactions with network devices as Applicant's event-tracking method does.

Furthermore, the "events" of Barnett are not the claimed web browsing events. The claimed events focus on user web browsing actions; namely which Web sites, pages or links were visited by the user, what files the user downloaded, etc. For example, the event can include various actions, including a user accessing a Web site, a user selecting a link on the Web site, a user selecting Web pages that transferred the user to another Web site or Web page, etc. The event can also include a user downloading a file, placing or removing an item into or from an electronic shopping cart, purchasing an item over a Web site, and using a search capability of a search engine.

Such an event is not contemplated by the calendaring system taught by Barnett. Nowhere does Barnett disclose that an event can be a user interaction with a server device of the computer network or that an event signal comprises data that is descriptive of such an interaction. The "event" according to Barnett is a calendar event such as a birthday or a dentist appointment or a baseball game starting at 1 PM on a Sunday. Thus, Barnett's event entry can include a description of an upcoming event, a date of the upcoming event entered into the calendar, a time of the upcoming event entered into the calendar, an event priority, a range of dates when the event is repeated, etc. (See col. 1, lines 7-10). In Barnett's calendaring system, details about the upcoming events are

entered into the calendar in their appropriate locations according to the date and time associated with each event. The event entry can also be repeated within a specified range of dates, such as for example every week for the next two months, for one month, etc. Events not having a specific time can be entered in a "To-Do" list accompanying the scheduled events. (See col. 1, lines 27-40). In addition, events can be added, removed or modified by the user. The user can request a notification when an event is about to occur, either by an e-mail or by some other means of communication. Finally, the user has an option to specify whether to share the user's own personal calendar with other users. (See col. 3, lines 53-60). Importantly, Barnett does not contemplate a user's web browsing actions as an event and accordingly Barnett does not fairly teach or even suggest the claimed invention.

In addition, Barnett does not teach or suggest the claimed event signals. Notably, an event signal includes data identifying user interaction with the data server, for example an event signal can reflect that a user placed an item in a Web site shopping cart, that a user initiated a search based on a search string, that a user initiated a purchase of an item, etc. A particular event signal can include information that describes user web browsing actions, such as an identification of a search string or an identification of the specific item placed in a shopping cart, or an associated URL.

Accordingly, independent claim 1 is not anticipated by Barnett and Applicant believes that claim 1 and its dependent claims are presently in condition for allowance. A notice of allowance of at least claims 1 – 12 is therefore respectfully requested.

With respect to claim 3 in the present application, Barnett's disclosure of a screen shot of a Login page at col. 8, line 60 – 67 and col. 9, line 15 does not fairly teach the claimed embedded tag of dependent claims 2 and 3 in the present application. Specifically, the tag introduced in claim 2 *appears in the event signal,* and denotes at least one item of data that is denoted by the tag identified in the instructions data that is descriptive of the user interaction. Barnett does not teach such an event signal as set forth above. Neither does Barnett teach that a tag denoting an item of data is descriptive of the user interaction with a server device on the network. Moreover, Barnett nowhere suggests extracting such a tag as required by claim 3. Accordingly, Applicant asserts that claims 2 and 3 are presently in condition for allowance.

Regarding claims 4 and 5 in the present application, Barnett's teaching that a user can login to the calendar server and manage a personal calendar and share that calendar with other users does not disclose or suggest that an event signal includes an event ID that is used to retrieve a particular set of corresponding instructions, as required by dependent claim 4. A login system merely validates a username and password (or similar) combination – it does not contemplate embedding an event ID in an event signal so that specific instructions that correspond to the event ID are retrieved. In addition, Barnett's login system does not teach that a list of network interaction event IDs is maintained with a set of instructions. Barnett's login system does not teach maintaining instructions that correspond to each network interaction event ID, as required by claim 5 in the present application. Accordingly, Applicant believes that claims 4 and 5 are presently in condition for allowance.

With respect to claim 6, Barnett discussed load balancing to the extent that the handling of a user session is directed to the previous server that the particular user was interacting with during that user's previous session. Barnett teaches that this is done in order to take advantage of a data cache that may contain information related to that user's session. (See col. 5, lines 25 - 30). The load balancer balances the load of received event signals by distributing the received signals among several different gateway modules, each of which handles a load of event signals. Each gateway module is separately addressable by the load balancer. In contrast, claim 6 in the present application balances a load of received event signals among several network gateway modules. Barnett's data caching does not fairly teach the claimed balancing of received event signals. Accordingly, Applicant believes that claim 6 is also presently in condition for allowance.

Regarding dependent claims 7 - 12, the rejection of these claims is grouped together with the rejection of independent claim 1, although the specific elements of these dependent claims that further refine and narrow the base claim are not individually addressed. Applicant asserts that the specific elements of these dependent claims are not taught by Barnett and respectfully requests allowance of dependent claims 7 - 12 or an explanation of how the cited prior art teaches each of the elements of each of these dependent claims.

With respect to claims 13 - 21, these claims are directed to an embodiment of the invention where the event-tracking information is included in a specially formatted web page. An example of

this embodiment is illustrated in Fig. 4 and the corresponding description. Barnett provides no discussion of including event-tracking information in a specially formatted web page. Moreover, nowhere does Barnett discuss specially formatted web pages in general and Barnett certainly makes no mention of formatting a web page in a special way in order to include event-tracking information. Accordingly, Applicant believes that Barnett does not fairly teach or disclose the embodiment of the invention in claims 13 - 21 and a notice of allowance of claims 13 - 21 is respectfully requested.

> Claims 34 - 39

Pending claims 34 - 39 stand rejected under section 102(e) as being anticipated by U.S. Patent No. 6,035,332 ("Ingrassia"). Applicant submits that the pending claims 34 - 39 are presently in condition for allowance as each and every element of the pending claims are not disclosed by Ingrassia.

In the Office Action, the Examiner contends that Ingrassia's method anticipates Applicant's method for tracking network browsing events. To that end, the Examiner has cited the abstract, FIGs. 1-5, and cols 1-20 of Ingrassia, which comprises the entire disclosure of Ingrassia. Applicant respectfully requests further details as to where Ingrassia teaches the present claims. Nonetheless, Applicant respectfully traverses the rejection with respect to claims 34-39 and it is submitted that the invention is fully distinguished from Ingrassia, as explained in more detail below.

The claimed invention is directed toward an event-tracking method that tracks users' web browsing interactions. In claim 34, the method is clarified in that it is directed toward a client device sending a request for additional data to an event tracking server.

In contrast, Ingrassia, specifically in Fig. 3 and the corresponding discussion at Col. 7, Lines 5 – 45, talks about how it monitors user interactions with web pages. Ingrassia uses an applet system that requires a separate application to be downloaded to the client device and executed. While Ingrassia is attempting to solve the same problem as the claimed invention, Ingrassia does so in a completely different manner than is presently claimed. In particular, the applet opens a dedicated socket and establishes a socket connection. (See, col. 7, lines 29-34).

Ingrassia, therefore is much less efficient than the present claims and requires more overhead (i.e., client device resources and CPU cycles). Any web browsing monitoring in Ingrassia takes place between the applet and the server via the dedicated socket connection that has been

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established. For that reason, if Ingrassia is tracking web browsing events, it is occurring from the applet via the dedicated socket connection, unlike the present claims.

      With respect to claims 35 - 39, these claims depend from independent claim 34, which Applicant asserts is in a condition for allowance. Moreover, the limitations of dependent claims 35-39 are not taught by Ingrassia and the Office Action is silent with respect to any teachings in Ingrassia that relate to the specific elements of claims 35 - 39. Accordingly, Applicant asserts that claims 34 - 39 are presently in condition for allowance and a notice of allowance is respectfully requested.

Conclusion

      If the Examiner has any questions or comments regarding the above Amendments and Remarks, the Examiner is respectfully urged to contact the undersigned at the number listed below.

Respectfully submitted,
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